

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

KAZI MANAGEMENT	:	Civil Action No. 4:20-cv-00924
SAINT CROIX, LLC and ZUBAIR	:	
KAZI,	:	
Plaintiffs	:	
	:	
v.	:	
	:	
SANTIAGO GARCIA GUTIERREZ,	:	JURY TRIAL DEMANDED
UNIVERSAL INVESTMENTS &	:	
TRADING, LLC, and UNITED FUEL	:	
SUPPLY SA, LLC, and JOHN DOE,	:	
Defendants		

**AFFIDAVIT OF SERVICE IN SUPPORT OF  
DEFAULT JUDGMENT**

I, Forest Dean Morgan, Esquire, declare under penalty of perjury the following facts are true and correct to the best of my information and belief:

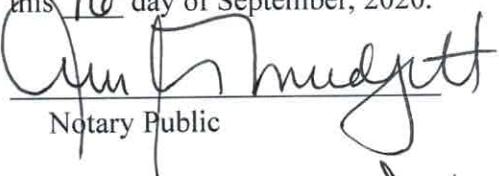
1. I am the Attorney for the Plaintiffs in this action.
2. A Complaint was filed herein on March 13, 2020.
3. I certify that Defendants Santiago Garcia Guitierrez (GUTIERREZ), Universal Investments and Trading, LLC (UIT), and United Fuel Supply SA, LLC (UFS SA) were properly served as set forth in Exhibit A, B, C, and D which are attached hereto and incorporated herein by reference.
4. No response has been served within the time allowed by law, nor has any defendant sought additional time to respond.

5. This Court entered a Default against Gutierrez, UIT, and UFS SA on September 8, 2020.



Forest Dean Morgan, Esquire  
PA Bar # 203088  
The Morgan Law Firm  
PO Box 767  
Hershey, PA 17033-0767  
Tel: 717-220-4300  
[dean@fdeanmorgan.com](mailto:dean@fdeanmorgan.com)  
Attorney for Plaintiffs

Sworn to and subscribed before me  
this 11<sup>th</sup> day of September, 2020.



Ann G. Mudgett  
Notary Public

My Commission Expires: Sept 23. 2021

Commonwealth of Pennsylvania - Notary Seal  
ANN G MUDGETT - Notary Public  
Dauphin County  
My Commission Expires Sep 23, 2021  
Commission Number 1117027

# Exhibit A





# Los Angeles Times

**Publication Date:** 07/19/2020

This electronic tear sheet confirms the ad appeared in the Los Angeles Times on the date and page indicated.

Ad Number: 7704466-1  
 Insertion Number:  
 Size: 2 x 1  
 Color Type: B&W

Client Name: The Morgan Law Firm  
 Advertiser:  
 Section/Page/Zone: Legal/B005/EAST  
 Description: Self Service Multi-Product Purchase

LATINEROS.COM

# JOBS

COLLECTIBLES

100

Collectibles and  
Memorabilia

ANNOUNCEMENTS

ENTERTAINMENT

500

General  
Announcements

FAMILY COMPAGNE

Business

Family

Business



# Exhibit B



## AFFIDAVIT OF PUBLICATION

## STATE OF TEXAS:

Before me, the undersigned authority, a Notary Public in and for the State of Texas, on this day personally appeared, the Newspaper Representative at the HOUSTON CHRONICLE, a daily newspaper published in Harris County, Texas, and generally circulated in the Counties of: HARRIS, TRINITY, WALKER, GRIMES, POLK, SAN JACINTO, WASHINGTON, MONTGOMERY, LIBERTY, AUSTIN, WALLER, CHAMBERS, COLORADO, BRAZORIA, FORT BEND, GALVESTON, WHARTON, JACKSON, and MATAGORDA and that the publication, of which the annexed herein, or attached to, is a true and correct copy, was published to-wit:

THE MORGAN LAW FIRM  
RAN A LEGAL NOTICE  
SIZE BEING: 2 x42 L

0034036923

Product	Date	Class	Page
HOU Chronicle	Jul 8 2020	Legal Notices	B 6
HOU Chronicle	Jul 8 2020	Legal Notices	B 6
HOU Chronicle	Jul 8 2020	Legal Notices	B 6
HOU Chronicle	Jul 8 2020	Legal Notices	B 6
HOU Chronicle	Jul 8 2020	Legal Notices	B 6
HOU Chronicle	Jul 15 2020	Legal Notices	B 6
HOU Chronicle	Jul 15 2020	Legal Notices	B 6
HOU Chronicle	Jul 15 2020	Legal Notices	B 6
HOU Chronicle	Jul 15 2020	Legal Notices	B 6
HOU Chronicle	Jul 15 2020	Legal Notices	B 6
HOU Chronicle	Jul 22 2020	Legal Notices	B 6
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HOU Chronicle	Jul 22 2020	Legal Notices	B 6
HOU Chronicle	Jul 22 2020	Legal Notices	B 6
HOU Chronicle	Jul 29 2020	Legal Notices	B 6
HOU Chronicle	Jul 29 2020	Legal Notices	B 6
HOU Chronicle	Jul 29 2020	Legal Notices	B 6
HOU Chronicle	Jul 29 2020	Legal Notices	B 6

Victoria Bond A Irchuk  
NEWSPAPER REPRESENTATIVE

Sworn and subscribed to before me, this 29th Day of July A.D. 2020



Notary Public in and for the State of Texas

*[Handwritten signature of Victoria Bond A Irchuk]*

United States District Court  
For the  
Southern District of Texas  
Kazi Management St. Croix, LLC and Zubair Kazi  
Plaintiff(s)

v.  
Santiago Garcia Gutierrez, Universal Investments &  
Trading, LLC, United Dual Supple, LLC and John  
DOE

Defendant(s)

Civil Action No. 4:20-cv-00924

**SUMMONS IN A CIVIL ACTION**

To: (Defendant's name and address) Santiago Garcia  
Gutierrez

1111 Caroline Street, Apt 2903

Houston, TX 77010

A lawsuit has been filed against you.

Within 21 days after service of this summons on you  
(not counting the day you received it)—or 60 days if  
you are the United States or a United States Agency,  
or an officer or employee of the United States  
described in Fed. R. Civ. P. 12 (a)(2) or (3)—you  
must serve on the plaintiff an answer to the attached  
complaint or a motion under Rule 12 of the Federal  
Rules of Civil Procedure. The answer or motion must  
be served on the plaintiff or plaintiff's attorney,  
whose name and address are:

The Morgan Law Firm  
Forest Dean Morgan, Esquire  
151 W. Chocolate Ave, Suite 145  
PO Box 787

Hershey, PA 17033  
If you fail to respond, judgment by default will be en-  
tered against you for the relief demanded in the com-  
plaint. You also must file you answer or motion with  
the court.

Date: April 29, 2020

David J. Bradley, Clerk of Court

/s/ R. A. Limon

Signature of Clerk or Deputy Clerk

# Exhibit C

<p>Attorney or Party without Attorney:            Forest Dean Morgan, Esq.            The Morgan Law Firm            151 W. Chocolate Avenue, Suite 145            PO Box 767            Hershey, PA 17033            Telephone No: 717-220-4300      FAX No: 717-585-6574</p>		For Court Use Only
<p>Attorney for Plaintiff</p>		Ref. No. or File No.:
<p>Insert name of Court, and Judicial District and Branch Court:            United States District Court For The Southern District Of Texas</p>		
<p>Plaintiff: Kazi Managmenet St. Croix, et al.            Defendant: Santiago Garcia Gutierrez, et al.</p>		
<p><b>AFFIDAVIT OF SERVICE</b></p>		Hearing Date:      Time:      Dept/Div:      Case Number: 420CV00924

1. At the time of service I was at least 18 years of age and not a party to this action.

2. I served copies of the Summons in a Civil Action; Complaint; Correspondence; Order Permitting Substituted Service and Continuing the Pre-Trial Conference

3. a. Party served: Universal Investments & Trading, LLC  
 b. Person served: Valerie Flurry, Person Authorized to Accept

4. Address where the party was served:  
 Secretary Of State  
 1500 11th Street, 3rd Floor  
 Sacramento, CA 95816

5. I served the party:  
 a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Fri., Aug. 07, 2020 (2) at: 2:35PM

7. Person Who Served Papers:      Fee for Service:      \$200.50  
 a. John M. Adams



1500 W. El Camino Avenue, #510  
 Sacramento, CA 95833  
 855-5VALPRO, Fax (866) 900-4665  
[www.ValproAttorneyServices.com](http://www.ValproAttorneyServices.com)

8. I declare under penalty of perjury under the laws of the State of TEXAS and under the laws of the United States Of America that the foregoing is true and correct.

AFFIDAVIT OF SERVICE

John M. Adams)

morgan.30397

# Exhibit D



The State of Texas  
Secretary of State

2020-317990-1

I, the undersigned, as Secretary of State of the State of Texas, DO HEREBY CERTIFY that according to the records of this office, a copy of the Summons in a Civil Action in the cause styled:

Kazi Management St. Croix LLC and Zubair Kazi VS Santiago Garcia Gutierrez,  
Universal Investment and Trading LLC United Fuel Supply LLC and John DOE  
United States District Court Southern District Of Texas  
Cause No: 420CV00924

was received by this office on June 16, 2020, and that a copy was forwarded on June 22, 2020, by CERTIFIED MAIL, return receipt requested to:

United Fuel Supply SA LLC  
C/O Santiago Garcia Gutierrez Registered Agent  
1111 Caroline Street, Apt 2903  
Houston, TX 77010

The RETURN RECEIPT was received in this office dated August 3, 2020, bearing signature.

Date issued: August 5, 2020



A handwritten signature of Ruth R. Hughes.

Ruth R. Hughes  
Secretary of State  
GF/vm



The State of Texas  
Secretary of State

2020-317990-2

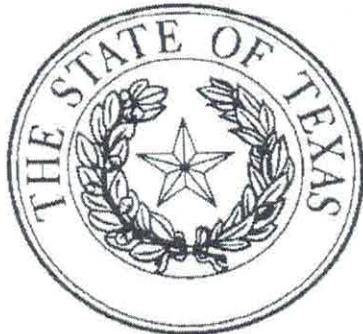
I, the undersigned, as Secretary of State of the State of Texas, DO HEREBY CERTIFY that according to the records of this office, a copy of the Summons in a Civil Action in the cause styled:

Kazi Management St. Croix LLC and Zubair Kazi VS Santiago Garcia Gutierrez,  
Universal Investment and Trading LLC United Fuel Supply LLC and John DOE  
United States District Court Southern District Of Texas  
Cause No: 420CV00924

was received by this office on June 16, 2020, and that a copy was forwarded on July 6, 2020, by CERTIFIED MAIL, return receipt requested to:

Santiago Garcia Gutierrez  
1111 Caroline Stret, Apt 2903  
Houston, TX 77010

The RETURN RECEIPT was received in this office dated August 3, 2020, bearing signature.



Date issued: August 5, 2020

A handwritten signature in black ink, appearing to read "Ruth R. Hughes".

Ruth R. Hughes  
Secretary of State  
GF/vm